

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE NORTHERN ASSURANCE COMPANY
OF AMERICA and AMERICAN HOME
ASSURANCE COMPANY,

Plaintiffs,

- against -

LAFARGE NORTH AMERICA, INC., and
AMERICAN STEAMSHIP OWNERS
MUTUAL PROTECTION AND INDEMNITY
ASSOCIATION, INC.

Defendants

ECF CASE

Case No.: 08 CV 3289 (CSH) (AJP)

NOTICE OF CROSS-MOTION TO STAY PROCEEDINGS

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law dated June 5, 2008 and the Declaration of Alan F. Kaufman dated June 5, 2008 submitted herewith, American Steamship Owners Mutual Protection and Indemnity Association, Inc., will cross-move before the Honorable Charles S. Haight of the United States District Court for the Southern District of New York, at a date to be determined by the Court, at the United States Courthouse at 500 Pearl Street, New York, New York, 10007 for an Order staying the proceedings in the captioned matter.

PLEASE TAKE FURTHER NOTICE that, pursuant to agreement with counsel for The Northern Assurance Company of America and American Home Assurance Company, opposition papers to this cross-motion shall be served on the undersigned on or by June 23, 2008, and reply papers to this cross-motion shall be served on or by July 3, 2008.

Dated: New York, New York
June 5, 2008

THACHER PROFFITT & WOOD LLP

By: /s/ John M. Woods
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